

REMARKS

Note regarding claims

Claims 1-9, including one independent claim 1, are pending in this patent application. Applicant has cancelled claims 1-9 without prejudice, and in their place has introduced claims 10-18, including independent claims 10, 12, and 14.

Patentability of claim 10

Independent claim 10 corresponds generally to now-cancelled claim 1. Claim 10 satisfies 35 USC 112, second paragraph. Furthermore, Applicant submits that claim 10 is patentable over JP 2003-89195 under 35 USC 102, as to which claim 1 was rejected. This is at least because claim 10 recites a *plurality* of positioning plates (see, e.g., FIG. 9 of the patent application), whereas JP 2003-89195 discloses a *single* positioning plate 10 in FIG. 3.

Patentability of claim 11

Dependent claim 11 corresponds generally to now-cancelled claim 2. Claim 11 satisfies 35 USC 112, second paragraph. Claim 11 is patentable at least because its base independent claim 10 is patentable. Furthermore, Applicant submits that claim 11 is separately patentable over JP 2003-89195 under 35 USC 102, as to which claim 2 was rejected. This is at least because claim 11 recites a *slit* (see, e.g., slit 42 of FIG. 1 of the patent application), whereas JP 2003-89195 discloses a *circular hole* 13 in FIG. 3, which is not a slit per the definition of this term provided by dictionary.com as “a straight, narrow cut, opening, or aperture.”

Patentability of claim 12

Claim 12 corresponds generally to now-cancelled claim 3, but in independent form. Claim 12 satisfies 35 USC 112, second paragraph. Claim 3 was not rejected over any prior art under 35 USC 102 or under 35 USC 103. Therefore, insofar as claim 12 satisfies 35 USC 112, second paragraph, it is in condition for allowance.

Patentability of claim 13

Dependent claim 13 corresponds generally to now-cancelled claim 4. Claim 13 satisfies 35 USC 112, second paragraph. Claim 13 is patentable at least because its base independent claim 10 is patentable. Furthermore, Applicant submits that claim 13 is separately patentable over JP 2003-89195 under 35 USC 102, as to which claim 4 was rejected. This is at least because the *single pair* of beams of claim 13 holds the *plurality* of head units. By comparison, JP 2003-89195 discloses *multiple* beams 15 in FIG. 3, each of which hold just a *single* head unit.

Patentability of claim 14

Claim 14 corresponds generally to now-cancelled claim 5, but in independent form. Claim 14 is a rewritten version of claim 5 that satisfies 35 USC 112, second paragraph. Claim 5 was not rejected over any prior art under 35 USC 102 or under 35 USC 103. Therefore, insofar as claim 14 satisfies 35 USC 112, second paragraph, it is in condition for allowance.

Patentability of claim 15

Dependent claim 15 corresponds generally to now-cancelled claim 6. Claim 15 is patentable at least because its base independent claim 10 is patentable. Furthermore, Applicant submits that claim 15 is separately patentable, insofar as claim 6 was not rejected over any prior art under 35 USC 102 or under 35 USC 103.

Patentability of claim 16

Dependent claim 16 corresponds generally to now-cancelled claim 7. Claim 16 is patentable at least because its base independent claim 10 is patentable, even though claim 7 itself was rejected under 35 USC 103(a) as being unpatentable over JP 2003-89195 in view of JP 55152066.

Patentability of claim 17

Dependent claim 17 corresponds generally to now-cancelled claim 8. Claim 17 is patentable at least because its base independent claim 10 is patentable. Furthermore, Applicant submits that claim 17 is separately patentable, insofar as claim 8 was not rejected over any prior art under 35 USC 102 or under 35 USC 103.

Patentability of claim 18

Dependent claim 18 corresponds generally to now-cancelled claim 9. Claim 18 is patentable at least because its base independent claim 10 is patentable, even though claim 9 itself was rejected under 35 USC 103(a) as being unpatentable over JP 2003-89195 in view of JP 60247565.

Respectfully Submitted,



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Michael A. Dryja, Reg. No. 39,662  
Attorney/Agent for Applicant(s)

Law Offices of Michael Dryja  
1230 E Baseline Rd #103-248  
Mesa, AZ 85204  
tel: 480-463-4837  
fax: 480-371-2110